

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JOSEPH J. WATLEY,	:	No. 3:16-CV-2059
Plaintiff :		
	:	(Judge Caputo)
v.	:	
	:	Electronically Filed Document
MICHAEL FELSMAN, DANIEL	:	
NILON, AND JAMES SOHNS,	:	<i>Complaint Filed 10/13/16</i>
Defendants :		

DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS

Defendants, Corporal Felsman, Corporal Nilon, and Trooper Sohns, of the Pennsylvania State Police (“PSP”), through counsel, hereby propose the following voir dire questions for the jury:

1. Do any of you know the parties or attorneys in this case?

Joseph J. Watley, Plaintiff.

Cynthia L. Pollick, Esquire, Counsel for Plaintiff.

Corporal Michael Felsman, Defendant.

Corporal Nilon, Defendant.

Trooper Sohns, Defendant.

Deputy Attorney General Lindsey A. Bedell and Deputy Attorney General Daniel Gallagher, Counsel for Corporal Felsman, Corporal Nilon, and Trooper Sohns.

2. Do you know any of the possible witnesses to this case? If yes, how do you them? Would you be able to put aside your relationship with that person and be a fair and impartial juror?

- Nancy Griswold.
- Robert Kennedy, Sergeant, PSP.
- Brian Stanco, Trooper, PSP.
- Nicholas Scochin, Trooper, PSP.
- Jessie Romanchick, Corporal, PSP.

3. Have you or anyone close to you ever worked for the Commonwealth of Pennsylvania, or for any other governmental body, either in the past or currently?

4. Have you or anyone close to you ever worked in a jail, prison, or in the field of law enforcement?

5. Have you or any member of your family ever been incarcerated in a local, state or federal correctional facility? If so, explain the circumstances. Would that incident affect your ability to render a fair and impartial verdict in this case?

6. Have you or any member of your family ever had a dispute or negative contact with the Pennsylvania State Police or any other law enforcement agency? If so, explain the circumstances. Would that incident affect your ability to render a fair and impartial verdict in this case?

7. Have you, or anyone close to you, ever had a dispute or negative contact with the Pennsylvania Office of Attorney General? If yes, what was the nature of that dispute? When? Would it impact your ability to be a fair and impartial juror?

8. Do any of you believe that individuals who are employed as police officers are more likely to be untruthful or untrustworthy than individuals employed elsewhere?

9. Have you or anyone close to you ever been arrested? If so, would that experience affect your ability to render a fair and impartial verdict in this case?

10. Have you ever served on a jury? If so, did you serve on a criminal or civil jury? Did the trial go to verdict? Did you have a positive or negative experience while serving as a juror in the past?

11. Have you or anyone close to you ever been a party to a lawsuit? If so, were you a plaintiff or defendant in the lawsuit? Would that experience affect your ability to render a fair and impartial verdict in this case?
12. Have you ever suffered any situation which you felt constituted a violation of your constitutional rights?
13. Do you believe that just because a lawsuit is filed means that the person filing the suit is entitled to relief?
14. Do any of you know of any reason why you could not follow the instructions of the Court and apply the law that he will explain to you?
15. Would you be unable to return a verdict in favor of the defendant if warranted by the evidence, due to a dislike of government or law enforcement?
16. Do you believe that just because the Plaintiff claims he was injured, it means that he is entitled to damages?
17. Have you, or anyone close to you, ever been the victim of what you believed to be police harassment or other police misconduct? Please describe. When did this occur? Would that impact your ability to be a fair and impartial juror?
18. Have you, or anyone close to you, ever made a complaint against a police officer or a police department? What was the nature of that complaint? When was the complaint? Would that experience impact your ability to be a fair and impartial juror?
19. Have you, or anyone close to you, ever suffered a situation which you felt was a violation of your constitutional rights? Please explain the circumstances/result. When did this happen? Would it impact your ability to be a fair and impartial juror?
20. The Plaintiff will present his case, and his evidence, first, and the defendants will present our evidence after his case is done. Will you be able to wait to reach any conclusions about the case until after you have heard all of the evidence presented by both sides?
21. Do any of you know of any other reason why you could not be fair and impartial in this case?

Respectfully submitted,

JOSH SHAPIRO
Attorney General

By: *s/Lindsey A. Bedell*

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Date: October 10, 2018

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Nilon and Sohns*

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CERTIFICATE OF SERVICE

I, Lindsey A. Bedell, Deputy Attorney General for the Commonwealth of Pennsylvania, Office of Attorney General, hereby certify that on October 10, 2018, I caused to be served a true and correct copy of the foregoing document titled Defendants' Proposed Voir Dire Questions to the following:

VIA ELECTRONIC FILING

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/s/ Lindsey A. Bedell
LINDSEY A. BEDELL
Deputy Attorney General